

**I. Cecilia Garza**

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November 15, 2024

VIA E-MAIL rjnavarro@rampagelaw.com, kralbin@rampagelaw.com

Ricardo J. Navarro

Denton Navarro Rodriguez Bernal Santee & Zech, P.C.

Counsel for Defendants

Re: *Gonzalez v. Starr County, et al.*, 7:24-CV-00132

Counsel,

We are writing to follow up on our meet and confer discussions. As promised, we are providing specific dates, custodians, and search terms to facilitate your responses to our requests for production. These are intended to clarify, rather than supersede, our requests.

As we discussed, Plaintiff understands that the current phase of discovery is limited to Defendants' immunity claims, which necessarily include both absolute and qualified immunity. For the issue of absolute immunity as to the DAs, discovery includes all relevant documents and communications bearing on (1) whether the DAs engaged in any investigatory functions, (2) whether the DAs had probable cause for Plaintiff's charging and arrest, and (3) whether the DAs gave legal advice to the Sheriff's office. Concerning the question of qualified immunity regarding the DAs, discovery includes all relevant documents and communications bearing on whether the DAs reasonably knew that arresting and prosecuting Plaintiff would violate her clearly established rights. For the Sheriff, the scope of limited discovery includes all relevant documents and communications bearing on whether the Sheriff reasonably knew that arresting and prosecuting Plaintiff would violate her clearly established rights.

As stated, Plaintiff agrees that Grand Jury proceedings and records may be withheld at this juncture of discovery. However, 1) documents and communications that discuss the grand jury presentment, but which were not themselves presented to the grand jury, are not afforded the same presumption of secrecy; and 2) a statement made outside the presence of the grand jury may be discovered, even if that statement was also made inside the grand jury.

We agreed to provide a date range to limit certain of the requests. The dates of September 1, 2021, to March 31, 2023, will be sufficient for the following requests for production: RFP 1, 2, 3, 4, 5, 8, 16, 17, 18, 19, 20, 21, 22. The date ranges for other requests remain as stated.

We request all responsive and discoverable documents as well as all responsive and discoverable outgoing and incoming communications made by or to, or in the possession of, the following people: All of the individuals who worked in the DA's or Sheriff's offices during the relevant time period. As agreed to in our Joint Discovery Plan, communications include email, text, and any

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Counsel

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other messaging platform (for example, Slack, Teams, Facebook Messenger, WhatsApp, Signal) on which defendants communicated in the course of business. It is our understanding that the following people worked at the DA's and Sheriff's offices during the relevant time period:

- Gocha Allen Ramirez
- Alexandria Lynn Barrera
- Rene Fuentes
- Abel Villareal Jr.
- Judith Solis
- Bernice Garcia
- Esmeralda Muniz
- Rafael Aguirre
- Juan Ramon Guerra Jr.
- Lenard Fuentes
- Larry Fuentes
- Ramel Rosa
- Carlos Delgado
- Lionel Alvarez Jr.
- Jose Molina
- Hilda Gonzalez Garza
- Anne Janet Molina

In completing your search, we ask that you use the following search terms:

- Lizelle / Lizele / Lizele
- Herrera
- Gonzalez
- Abortion
- Texas Senate Bill 8
- SB 8 / SB8 / S.B. 8 / S.B.8
- Texas Heartbeat Act + Heartbeat Bill
- "Whole Woman's Health"
- Pregnant/pregnancy
- Endangerment of a fetus
- Fetus
- Fetal Demise
- "Baby" within 20 words of "unborn"
- Unborn
- Miscarriage
- Cremate / Cremated / Crematory / Cremation
- Abortion pill
- Cytotec
- Misoprostol
- Medication abortion
- Self induced / self-induced / self-managed / self managed

Counsel

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- Obstetrician / OB / OB/GYN / OB-GYN / Obstetric
- Calixtro Villareal
- 19.01
- 19.02
- 19.06
- Homicide
- Murder
- Press conference
- (Dr. OR Doctor) within two words of “Ramirez”
- (Dr. OR Doctor) within two words of “Lozano”
- Starr County Memorial Hospital
- SCMH
- For the following people, please also search for any nickname or other name people commonly use for them:
 - Luis Ramirez
 - Rodolfo Lozano
 - Norma Aguirre
 - Paula Arrambide
 - Martha Torres
 - Brandy Voss
 - Roy Pena
 - Daisy Perez

If any of this is unclear, please let us know. We are willing to work with you to narrow terms or craft search strings if you can let us know what search tool you use.

Please let us know by November 19, 2024, if you agree to add the above referenced search terms and custodians.

Thank you,

GARZA MARTINEZ, PLLC



I. Cecilia Garza



12/2/2024

Ida Cecilia Garza
Veronica Sepulveda Martinez
GARZA MARTINEZ, PLLC

Via Email

Adriana Piñon
David A. Donatti
Lauren Alicia Johnson
AMERICAN CIVIL LIBERTIES UNION

Via Email

Re: Gonzalez, Lizelle v Starr County et al; Cause No. 7:24-CV-00132 (U.S.D.C. – S.D.TX. – McALLEN DIV); Defendants' Response to Plaintiff's Proposed Search Terms by letter dated 11/15/2024.

Dear Counsel:

This is our response to your letter dated 11/15/2024 responding to our suggestion that you provide us with a set of search terms to utilize on the ESI database that we had requested from Starr County. It was our intention to get from you a date range that was acceptable to you and to get from you a set of search terms that you believed were most relevant. It was not our intention to re-open or revisit our prior objections and responses that we had provided to you in response to your written discovery requests or in response to your deficiency letter.

What that caveat, we had obtained from the County's IT Director the outgoing email content in .pst format the Starr County domain name used by Starr County DA's Office and the Starr County Sheriff's Office pertaining to the three named individual Defendants – Gocha Ramirez; Alexandria Barrera, and Sheriff Rene Fuentes. We ran the search terms you suggested as to each of the above-named individuals' .pst files and kept a log of the outcomes. Many of those we had already run and got no results. I am providing you with a search term log reflecting the outcomes of the search terms on the pst emails files indicated.

Content that was relevant to this case was exported to a pdf file and those results are posted in the Document Production Sharefile under a subfolder labeled as 9. ESI Production.

I also interviewed the IT Director for regarding the County's use or maintenance of other messaging platforms (for example, Slack, Teams, Facebook Messenger, WhatsApp, Signal). Starr County does not maintain a presence on any of these platforms. Therefore, we did not conduct any further research on any of these messaging platforms because the County does not use or maintain a presence on them.

We did not expand the email domain search to include the incoming .pst files of the three individually named defendants. Given that the point of the search was to identify communications pertaining to the activity of the three individual defendants, a search in a data base of outgoing emails would capture any incoming email to which a recipient responded. A search in a data base for email content to which the recipient did not respond would not score a hit. Hence the probability

Defendants' Response to Plaintiff's Proposed ESI Search Terms

Lizelle Gonzalez v Starr County et al;

December 1, 2024

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of finding relevant material was highest by searching outgoing emails, not incoming emails. These searches are tedious and time-consuming. Loading the database into a pst view takes a long time and depending on the size of the file, the searches themselves can take a long time to generate. Had we found emails relevant to Plaintiffs contentions in the outgoing emails of the individual defendants, then a further search of incoming emails may have been warranted. As to this decision, we are guided by the principle of proportionality embedded in Rule 26.

You also listed a number of individuals who you stated worked at the DA's and the Sheriff's Offices during the relevant time period. We did not agree to conduct searches of all outgoing or incoming emails of the individuals you listed as working in the DA's or the Sheriff's Office. Again, Had the search terms applied to the .pst file of the individual defendants yielded relevant information, a further search may have been warranted. As reflected in the log, the search terms applied to the outgoing emails of the three individual defendants yielded no relevant information pertaining to this case. As to this decision, again, we are guided by the principle of proportionality embedded in Rule 26.

Below is a link to the Sharefile production folder, which you already have access to. Please advise if you have trouble with it.

<https://rampage-rgv.sharefile.com/f/fo3a897c-fb86-46a4-a731-7f2304aa594b>

Respectfully submitted,

Ricardo J. Navarro

Ricardo J. Navarro
Kelly R. Albin
COUNSEL FOR DEFENDANTS

Attach:

Search Term Log

LIZELLE GONZALEZ LAWSUIT
ESI SEARCH TERMS

**DISCOVERY NOTES ON ESI SEARCH TERMS PROPOSED BY PLAINTIFFS
[RJN / KNG][COMPLETED 12/2/2024]:**

DATABASE USED: OUTGOING EMAILS FROM THE STARR COUNTY EMAIL PERTAINING TO GOCHA ALLEN RAMIREZ; ALEXANDRIA BARRERA; AND SHERIFF RENE FUENTES; FOR THE TIME PERIOD 10/1/2021 THROUGH 7/1/2022 IN .PST FORMAT. SEARCH TERMS ARE THOSE PRPOSED BY PLAINTIFF’S COUNSEL VIA A LETTER DATED 11/15/2024. SEARCHES DONE BY ATTORNEY R.J. NAVARRO AND BY PARALEGAL KRISTIN N. GETTY.

A. BASELINE ESI DATA; EMAILS IN PST FORMAT

1. Requested and received all outgoing emails from IT Director from Starr County domains pertaining to Gocha Allen Ramirez; Alexandria Barrera; and Sheriff Rene Fuentes to cover period from 10/1/2021 through 7/1/2022.
2. Received .pst file covering larger time period. Split out .pst file for time period from 10/1/2021 through 7/1/2022 to focus search on relevant time period.
3. All ESI search terms specified below applied to the 10/1/2021 through 7/1/2022 data file for each individual.

B. ALEXANDRIA BARRERA (AB):

1. Ran search for all emails from Alexandria Barrera to SCSO domain, @starrcountysoc.org.
 - a. Got 17 hits. None related to this case.
2. Ran search for all emails from AB to DA domain, @da.co.starr.tx.us
 - a. Got 483 hits. None related to this case.
3. Ran search for text “Lizelle”.
 - a. Got zero hits
4. Ran search for text “Lizzele”.
 - a. Got zero hits.
5. Ran search for text “Lizele”.
 - a. Got zero hits.
6. Ran a search for “Herrera”.
 - a. Got zero hits.

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7. Ran a search for “abortion”.
 - a. Got zero hits.
8. Ran search for “Texas Senate Bill 8”.
 - a. Got zero hits
9. Ran a search for “SB 8”.
 - a. Got zero hits.
10. Ran a search for “SB8”.
 - a. Got zero hits.
11. Ran a search for “S. B. 8” and “S.B.8”.
 - a. Got zero hits.
12. Ran a search for “Texas Heartbeat Act” and “Heartbeat Bill”.
 - a. Got zero hits.
13. Ran a search for “Whole Woman’s Health”.
 - a. Got zero hits.
14. Ran a search for "Pregnant".
 - a. Got 1 hit, unrelated to this matter. Referenced handling of a criminal case appeal.
15. Ran a search for “fetus” and “fetal”.
 - a. Got zero hits.
16. Ran a search for “baby”.
 - a. Got 11 hits, all pertaining to ALB having a baby and baby showers.
17. Ran a search for “unborn”.
 - a. Got zero hits.
18. Ran a search for “miscarriage”.
 - a. Got zero hits.
19. Ran a search for “create”, “cremated”, “crematory”, and “cremation”.
 - a. Got zero hits.

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20. Ran search for all emails from Alexandria Barrera to SCMH domain @starrcountyhospital.com
 - a. Got zero hits.
21. Ran a search for “Cytotec”.
 - a. Got zero hits.
22. Ran a search for “misoprostol”.
 - a. Got zero hits.
23. Ran a search for “Self induced”, “self-induced”, “self-managed”, and “self managed”.
 - a. Got zero hits.
24. Ran search for all emails from AB to Esmeralda Muniz at SCSO
 - a. Got hit for 3 emails; none pertaining to Lizelle Gonzalez.
25. Ran search for all emails from AB to Leonel Alvarez at SCSO
 - a. Got zero hits
26. Ran search for all emails from AB to Abel Villarreal
 - a. Got 26 hits; one on 2/28/2028 regarding next GJ date; no specific reference to this case.
27. Ran search for AB emails to “Gocha Ramirez”
 - a. Got 47 hits. Only one email referencing Lisette Fuentes Memo dated 3/22/2022. No connection to this case.
28. Ran search for “obstetrician”, “OB”, “OB/GYN”, “OB-GYN”, and “Obstetric”.
 - a. Got zero hits.
29. Ran a search for “Calixtro”.
 - a. Got 41 hits, none related to this case.
30. Ran a search for “19.01” and “19.02”.
 - a. Got zero hits.
31. Ran a search for “19.06”.
 - a. Got zero hits.
32. Ran a search for “homicide”.
 - a. Got zero hits.

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33. Ran a search for “murder”.
 - a. Got 7 hits. None related to this case.
34. Ran a search for “press conference”.
 - a. Got zero hits.
35. Ran a search for “Lozano”.
 - a. Got 2 hits, none pertaining to this case or this plaintiff.
36. Ran a search on “22-CR-61”.
 - a. Got zero hits.
37. Ran a search for “2022-00085”.
 - a. Got zero hits.
38. Ran a search for “75851761”.
 - a. Got zero hits.
39. Ran a search for “Starr County Memorial Hospital”.
 - a. Got zero hits.
40. Ran a search for “SCMH”.
 - a. Got 4 hits, none pertaining to this case or this plaintiff.
41. Ran a search for “Rodolfo Lozano”.
 - a. Got zero hits.
42. Ran a search for “Norma Aguirre”.
 - a. Got zero hits.
43. Ran a search for “Paula Arrambide”.
 - a. Got zero hits.
44. Ran a search for “Martha Torres”.
 - a. Got zero hits.
45. Ran a search for “Brandy Voss”.
 - a. Got zero hits.
46. Ran a search for “Roy Pena”.
 - a. Got zero hits.

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47. Ran a search for “Daisy Perez”.
 - a. Got zero hits.

C. GOCHA RAMIREZ (GR):

1. Search for GR emails to Rene Fuentes
 - a. Got zero hits.
2. Search for GR emails to Alexandria Barrera
 - a. Got 23 hits; none related to Lizelle Gonzalez
3. Search GR Emails to SCSO domain, @starrcountyso.org.
 - a. Got 42 hits, only 3 pertain to this matter and overlap with Lizelle media requests/FOIA requests.
4. Search GR Emails for “Lizelle”
 - a. Got 33 hits; mostly in April 2022 pertaining to media firestorm
 - b. Exported binder to pdf w/ embedded attachments. See GR Emails w Lizelle uploaded to Sharefile production folder.
5. Search GR Emails for “Lizzele”
 - a. Got zero hits.
6. Search GR Emails for “Lizele”.
 - a. Got zero hits.
7. Search GR Emails for “Esmeralda Muniz”
 - a. Got zero hits.
8. Search GR Emails for “abortion”
 - a. Got 9 hits. All in April 2022. Overlaps with “Lizelle”
9. Search GR Emails for “SB8”
 - a. Got zero hits.
10. Search GR emails for “SB 8”
 - a. Got 6 hits; all related to “Notice of OOG Grant Payments”

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- b. Exported binder to pdf w/ embedded attachments. See GR Emails w SB 8 uploaded to Sharefile production file.
- 11. Search GR Emails for “S.B. 8”.
 - a. Got zero hits.
- 12. Search GR Emails for “S.B.8”.
 - a. Got zero hits.
- 13. Search GR Emails for “Texas Heartbeat Act.”
 - a. Got zero hits.
- 14. Search GR Emails for “Heartbeat Bill”.
 - a. Got zero hits.
- 15. Search GR Emails for “Fetus”.
 - a. Got zero hits.
- 16. Search GR Emails for “Fetal”.
 - a. Got zero hits.
- 17. Search GR Emails for “Pregnant”.
 - a. Got zero hits.
- 18. Search GR Emails for “Unborn”.
 - a. Got zero hits.
- 19. Search GR Emails for “Miscarriage”.
 - a. Got 1 hit related to a press inquiry
 - b. Exported binder to pdf w/ embedded attachments. See GR Emails w Miscarriage on Uploaded to Sharefile production folder.
- 20. Search GR Emails for “Cytotec”.
 - a. Got zero hits.
- 21. Search GR Emails for “Misoprostol”.
 - a. Got zero hits.
- 22. Search GR Emails for “Medication”.
 - a. Got zero hits.

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23. Search GR Emails for “Self Induced”.
 - a. Got 3 hits; all related to SBOT Grievance.
24. Search Gr Emails for “Self-Induced”.
 - a. Got 6 hits; all overlap with “Lizelle” and press inquiries. Emails exported to pdf binder. Uploaded to Sharefile production folder.
25. Search GR Emails for “Self-Managed” and “Self Managed”.
 - a. Got zero hits on either search.
26. Search GR Emails for “Obstetrician”.
 - a. Got zero hits.
27. Search GR Emails for “OB”.
 - a. Got 135 hits; 6 related to this case. Exported to pdf binder for production.
28. Search GR Emails for “OB/GYN”, “OB-GYN”, “Obstetric”, and “Gynecologist”.
 - a. Got zero hits.
29. Search GR Emails for “Calixtro”.
 - a. Got 6 hits, only one related to this case in reference to a Protective Order for Lizelle Gonzalez. Exported for production.
30. Search GR Emails for “Ranell Rosa” [deputy that took incident complaint]
 - a. Got zero hits.
31. Search GR Emails for “19.01”.
 - a. Got zero hits.
32. Search GR Emails for “19.02”.
 - a. Got zero hits.
33. Search GR Emails for “19.06”.
 - a. Got 1 hit within specified time frame related to this case. Exported email to pdf w/ embedded attachments. Uploaded email to Sharefile production folder.
34. Search GR Emails for “Homicide”.
 - a. Got 4 hits: 3 pertaining to the SBOT Grievance file, and one unrelated Outlook meeting invite pertaining to a double homicide.

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35. Search GR Emails for “Murder”.
 - a. Got 12 hits; mostly press inquiries and FOIA requests. Emails exported to pdf and uploaded to Sharefile production folder See GR Emails w Murder.
36. Search GR Emails for “Press conference”.
 - a. Got 11 hits, after manual review of each file, none pertain to this matter.
37. Search GR Emails for “Dr”.
 - a. Got 7 hits, after manual review, none pertain to this matter.
38. Search GR Emails for “Doctor”.
 - a. Got 7 hits, after manual review, none pertain to this matter.
39. Search GR Emails for “Lozano”.
 - a. Got 6 hits, none pertain to this matter.
40. Search GR Emails for “Starr County Memorial Hospital”.
 - a. Got 2 hits, both public information requests pertaining to this matter.
 - b. Exported binder to pdf w/ embedded attachments. See GR Emails w Starr County Memorial Hospital. Uploaded to Sharefile production folder.
41. Search GR Emails for “SCMH”.
 - a. Got zero hits.
42. Search GR Emails for “Luis Ramirez”.
 - a. Got zero hits.
43. Search GR Emails for “Rodolfo Lozano”.
 - a. Got zero hits.
44. Search GR Emails for “Norma Aguirre”.
 - a. Got zero hits.
45. Search GR Emails for “Paula Arrambide”.
 - a. Got zero hits.
46. Search GR Emails for “Martha Torres”.
 - a. Got zero hits.

LIZELLE GONZALEZ LAWSUIT
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47. Search GR Emails for “Brandy Voss”.
 - a. Got zero hits.
48. Search GR Emails for “Roy Pena”.
 - a. Got 7 hits, none pertaining to this matter. All 7 emails pertain to Starr County Travel Policy.
49. Search GR Emails for “Daisy Perez”.
 - a. Got zero hits.

D. RENE FUENTES

1. Run search of RF Emails “Lizelle” text term.
 - a. Got 5 hits; all in April 2022.
 - b. Exported this as RF Emails with Lizelle as search term.
2. Manual review of 61 email does not reveal any other email pertaining to Lizelle Gonzales or the investigation or indictment, and case disposition of Lizelle Gonzalez.

-END-

Ricardo J. Navarro



December 4, 2024

Ricardo J. Navarro, Esq.
Kelly R. Albin, Esq.
Denton Navarro Rodriguez Bernal Santee & Zech, P.C.
Counsel for Defendants
VIA E-MAIL rjnavarro@rampagelaw.com, kralbin@rampagelaw.com

Re: *Gonzalez v. Starr County, et al.*, 7:24-CV-00132

Counsel,

We have received your 12/2/24 letter concerning electronic discovery and are writing to ask you to confirm whether or not we have the correct understanding of the below points before proceeding:

- You ran searches using the identified search terms only on outgoing emails and did not run searches on any text messages, or any other internal or external messaging platforms or incoming emails for Defendants Barrera, Ramirez, and Fuentes.
- Throughout the letter, when you indicate “zero hits” you mean that the search found zero emails containing the search terms, not that you identified zero emails that you consider responsive or relevant to the immunity phase of discovery.
- You searched Defendant Barrera’s outgoing emails between 10/1/2021 and 7/1/2022 with the 47 identified search terms and found no emails with any mention of this case or plaintiff.
- When you say that the search yielded 17 hits for Defendant Barrera to SCSO or DA domain and “none related to this case,” you mean none of the emails concern this case or plaintiff, not that you assert they are privileged or beyond the scope of the current phase of discovery.
- You searched Defendant Ramirez’s outgoing emails between 10/1/2021 and 7/1/2022 with the 49 identified search terms and found zero emails containing any of those search terms before 04/2022.
- All of Defendant Ramirez’s outgoing emails that contained any of the 49 search terms have been exported and included in your 12/2 production.
- For Defendant Fuentes, you only searched for the term “Lizelle” in his outgoing emails. You did not search his email for any of the other search terms. You also did not conduct searches of any electronically-stored information in Defendant Fuentes’s custody and control other than email.
- You searched Defendant Fuentes’s outgoing emails between 10/1/2021 and 7/1/2022 with 1 search term (“Lizelle”) and found zero emails containing this search term before 04/2022.

ACLU FOUNDATION OF TEXAS

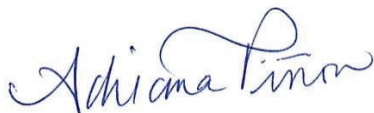
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WITH OFFICES IN AUSTIN, BROWNSVILLE, DALLAS AND EL PASO

- You did not search for responsive documents, including running searches using the identified search terms, in any of the electronic files in the possession of the District Attorney's Office or the Sheriff's Office.
- Defendants do not use any messaging platform (including text messages, Slack, Teams, Facebook Messenger, WhatsApp, Signal), or any other platform to communicate about their work.

Additionally, would you please clarify the information that is on page 3 line 26: "AB to Abel Villarreal a. Got 26 hits; one on 2/28/2028 regarding next GJ date; no specific reference to this case"? Was the February 28 email (we assume the year is a typo) an email about the grand jury date for Plaintiff Ms. Gonzalez or for a different case?

Please confirm or explain by end of the day on Wednesday December 4, so that we may have this information before our deadline of Friday December 6 to submit a notice of disputes to the Court. In response to Ms. Albin's 12/3/2024 email regarding scheduling depositions, we are not able to proceed with the scheduling of depositions until we resolve the outstanding discovery disputes with the Court's assistance.

Sincerely,

A handwritten signature in blue ink that reads "Adriana Piñon". The signature is fluid and cursive, with the first name "Adriana" and last name "Piñon" clearly distinguishable.

Adriana Piñon
Legal Director
ACLU Foundation of Texas
P.O. Box 8306
Houston, TX 77288-8306
(713) 942-8146 x 1027
apinon@aclutx.org

From: [Kelly R. Albin](#)
To: [External - A Pinon](#); [Ric J. Navarro](#)
Cc: [Lauren Johnson](#); [Cecilia Garza](#); [David Donatti](#); [Kristin N. Getty](#)
Subject: RE: Letter concerning ESI search log
Date: Thursday, December 5, 2024 10:54:20 AM
Attachments: [image002.png](#)
[image003.png](#)

This Message Is From an External Sender

This message came from outside your organization.

Good morning,

The County and Individual Defendants stand by what has already been communicated about this matter. Additionally, we will be issuing subpoenas for the third-party witnesses by the end of the day tomorrow, 12/6. These are the witnesses that the Plaintiff disclosed as having knowledge of Plaintiff's claims. I propose December 16th, 17th, or 18th. Please advise if you have a preference on the date. We are willing to take these via Zoom to make scheduling a little easier.

Take care,

Kelly

Kelly Albin

Senior Associate Attorney

kralbin@rampagelaw.com



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From: Adriana Pinon <APinon@aclutx.org>
Sent: Wednesday, December 4, 2024 10:54 AM
To: Kelly R. Albin <kralbin@rampagelaw.com>; Ric J. Navarro <rjnavarro@rampagelaw.com>
Cc: Lauren Johnson <ljohnson@aclu.org>; Cecilia Garza <cecilia@garzamartinezlaw.com>; David Donatti <ddonatti@aclutx.org>; Kristin N. Getty <kngetty@rampagelaw.com>
Subject: Letter concerning ESI search log

Counsel,

Please see the attached letter regarding our understanding of the ESI search log you provided. We kindly request a response by end of the day today, so that we may have this information before our deadline of Friday December 6 to submit a notice of disputes to the Court.

Sincerely,
Adriana

Adriana Piñon
Pronouns: she/her(s)/ella

Legal Director
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